IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA ALEXANDRIA DIVISION

AMAZON.COM, INC. and AMAZON DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba
NORTHSTAR COMMERCIAL
PARTNERS; BRIAN WATSON;
STERLING NCP FF, LLC; MANASSAS
NCP FF, LLC; NSIPI
ADMINISTRATIVE MANAGER;
NOVA WPC LLC; WHITE PEAKS
CAPITAL LLC; VILLANOVA TRUST;
CASEY KIRSCHNER; ALLCORE
DEVELOPMENT LLC; FINBRIT
HOLDINGS LLS; CHESHIRE
VENTURES LLC; CARLETON
NELSON; and JOHN DOES 1-20,

Defendants.

800 HOYT LLC,

Intervening Interpleader Plaintiff,

v.

BRIAN WATSON, WDC HOLDINGS LLC, PLW CAPITAL I, LLC, BW HOLDINGS, LLC, AMAZON.COM, INC, and AMAZON DATA SERVICES, INC.

Interpleader Defendants.

CASE NO. 1:20-cv-484-LO-TCB

DEFENDANTS' NOTICE OF INTENT TO FILE AN OBJECTION

PLEASE TAKE NOTICE that Defendants Brian Watson, WDC Holdings, LLC, dba Northstar Commercial Partners, Sterling NCP FF, LLC, Manassas NCP FF, LLC, and NSIPI Administrative Manager, LLC (collectively, "Defendants"), by and through their counsel, IFRAH PLLC and Brownstein Hyatt Farber Schreck, LLP, respectfully submit Defendants' Notice of Intent to File an Objection ("Notice") and notice the same for hearing, on or before Tuesday, December 21, 2021, pursuant to the Court's December 14, 2021 Notice of Grounds for Judicial Disqualification. Defendants are filing this Notice because they advised the Court at the December 15, 2021 scheduling conference that they would notify the Court by close of business Friday, December 17, 2021 as to whether they intended to object.

On December 17, 2021, Mr. Casey Kirschner advised counsel for Defendants that he anticipates filing an objection. Likewise, counsel for Carleton Nelson and Cheshire Ventures LLC represented that his clients intend to file an objection.

Dated: December 17, 2021 Respectfully submitted,

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Counsel for Defendants Brian Watson, WDC Holdings, LLC dba Northstar Commercial Partners, Sterling NCP FF, LLC, Manassas NCP FF, LLC, and NSIPI Administrative Manager, LLC

CERTIFICATE OF SERVICE

I hereby certify that on December 17, 2021, I will email the foregoing document to the known attorney of record for each other party. For those parties for whom counsel is not known, a true and correct copy of the foregoing document shall be served by U.S. mail to their last known address.

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